

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VONTERRIOUS HUMBERT, (01),  
[DOB: 01/12/2000]

TREMAINE JOHNSON, (02),  
[DOB: 11/28/1998]

and

HENRY SIMMONS, (03),  
[DOB: 03/06/2000]

Defendants.

Case No. \_\_\_\_\_

**COUNT ONE: ALL DEFENDANTS**

*Conspiracy to Commit Hobbs Act Robberies*

18 U.S.C. § 1951(a)

NMT: 20 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

Class C Felony

**COUNT TWO: ALL DEFENDANTS**

*Use of a Firearm During and in Relation to a  
Crime of Violence*

18 U.S.C. § 924(c)(1)(A)(ii) and 2

NLT: 7 years' Imprisonment

NMT: Life Imprisonment

*Consecutive to any other sentence*

NMT: \$250,000 Fine

NMT: 5 Years' Supervised Release

Class A Felony

\$100 Mandatory Assessment Each Count

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Between on or about November 21, 2018, and November 27, 2018, in the Western District of Missouri, the defendants, **VONTERRIOUS HUMBERT**, **TREMAINE JOHNSON**, and **HENRY SIMMONS**, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others to unlawfully obstruct, delay, and affect, and attempt to obstruct, delay and affect commerce as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce in some way and degree by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants did knowingly combine, conspire, confederate, and agree with

each other and others to intentionally and unlawfully take and obtain property, consisting of United States currency from businesses engaged in interstate commerce, and such property was taken against the will of persons employed by such businesses, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each person, that is, the defendants brandished a firearm during demands for property from the employees.

All in violation of Title 18, United States Code, Section 1951(a).

**COUNT TWO**

Between on or about November 21, 2018, and November 27, 2018, in the Western District of Missouri, the defendants, **VONTERRIOS HUMBERT, TREMAINE JOHNSON, and HENRY SIMMONS**, aiding and abetting each other, did knowingly and intentionally brandish a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is conspiracy to commit robbery affecting interstate commerce as charged in Count One, all allegations of which are incorporated by reference herein, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

A TRUE BILL.

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12/11/18  
DATE

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/s/ *Kathryn Varnon*  
FOREPERSON OF THE GRAND JURY

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/s/ *Ashleigh A. Ragner*  
Ashleigh A. Ragner  
Assistant United States Attorney  
Narcotics & Violent Crimes, Team One  
Western District of Missouri